

# Exhibit H

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARTHUR J. GALLAGHER & CO.,	)	
	)	Case No.: 1:22-cv-03931
Plaintiff,	)	
	)	
v.	)	<b>DEMAND FOR JURY TRIAL</b>
	)	
ALLIANT INSURANCE SERVICES, INC.	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF SUSAN KOCI**

I, Susan Koci, declare as follows:

1. I am over the age of 18 and if called as a witness could competently testify to the facts set forth herein.
2. I am Counsel at the law firm of Riley Safer Holmes & Cancila LLP.
3. I am familiar with Arthur J. Gallagher & Co.'s ("Gallagher") document production in the cases captioned *Arthur J. Gallagher & Co. v. Don Tarantino, et al.*, Case No. 20-cv-05505-EMC (N.D. Cal.); *Gallagher Benefit Services, Inc. v. David Ghirardini, et al.*, Case No. 502020CA004646XXXXMB (15th Jud. Cir., Palm Beach Cty., Fla.); *Arthur J. Gallagher & Co. v. Steven Pierce, et al.*, Cause No. 471-03886-2020 (471st Jud. Dist., Collin Cty., Tex.); and *Arthur J. Gallagher & Co. v. Alliant Insurance Services, Inc., et al.*, Civil Action No. 2184CV02828 (Commonwealth of Mass., Superior Ct. Dept.).
4. During the course of litigating the above-referenced cases, Gallagher produced several copies of its Mobile Device Policy. Although the previously-produced documents related to individual defendants in those cases, the terms set forth therein are substantially

similar to the Mobile Device Policies referenced in and attached to Gallagher's Complaint in this case.

5. The Mobile Device Policies produced in the California, Florida, Texas, and Massachusetts cases were produced prior to July 11, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 5, 2022

/s/ Susan Koci

Susan Koci